



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**SENSITIVE**

**MEMORANDUM**

February 11, 2025

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1190 - Feenstra for Congress and Thomas Datwyler,  
Treasurer (C00693663)

RESOLUTION TERMS: Develop and implement a procedure requiring the review of  
bank transfers by multiple staff members during report  
preparation; and pay a civil penalty of \$8,275.

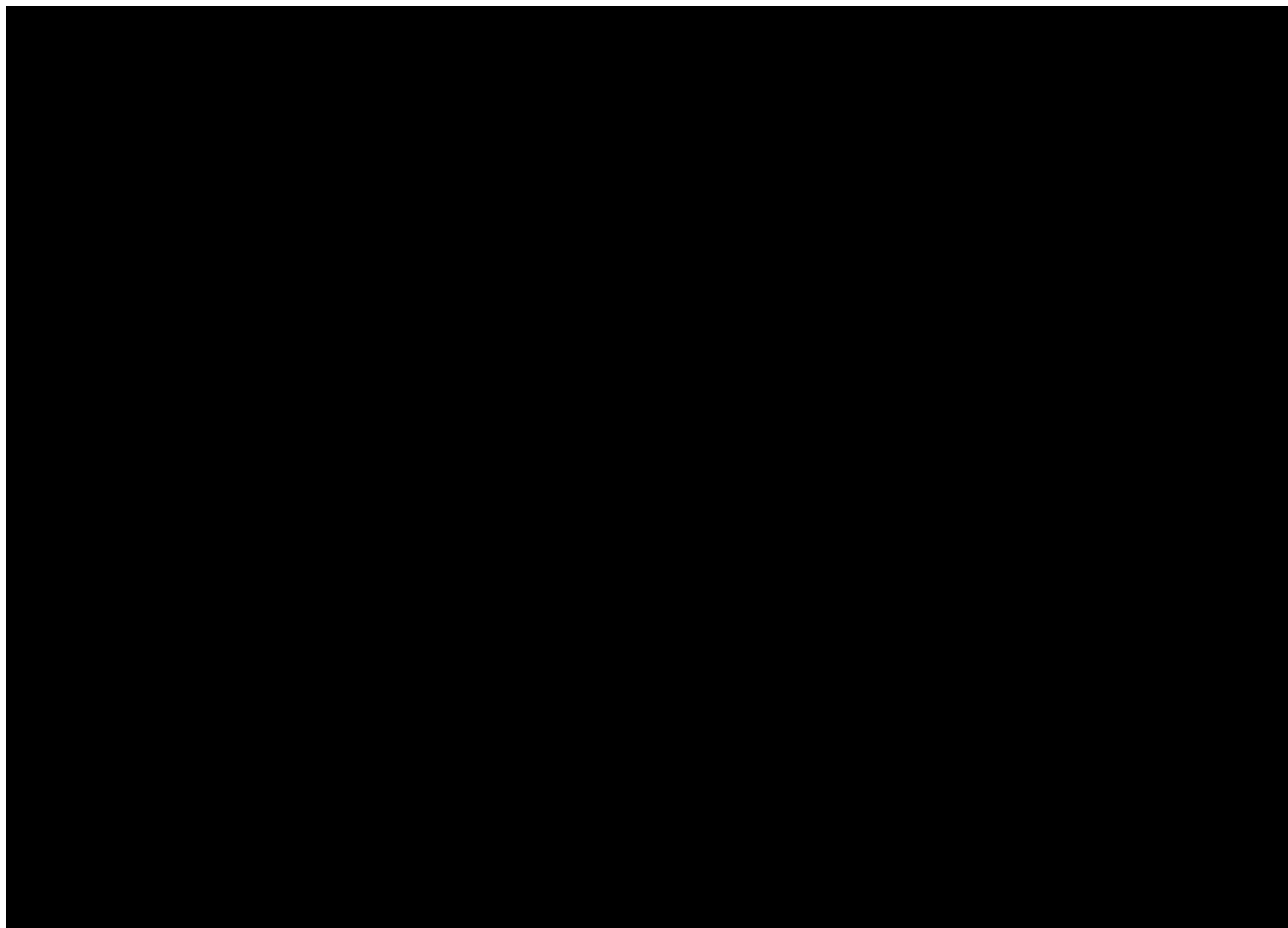
Attached for your review is a signed Negotiated Settlement pertaining to ADR 1190 (RAD 24L-40). The ADR Office received this referral from the Reports Analysis Division (RAD) on October 15, 2024.

**SUMMARY:** RAD referred Feenstra for Congress and Thomas Datwyler, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2024 April Quarterly Report, filed on April 15, 2024. On May 15, 2024, the Committee filed an Amended 2024 April Quarterly Report which disclosed additional disbursements of \$288,632.05, that were not disclosed in the original report.

During negotiations, the Committee stated that internal miscommunication led to the failure to accurately disclose the activity in the original report. In particular, the disbursements were mistakenly classified as an internal transfer between the

Recommendation to Approve  
Negotiated Settlement  
ADR 1190 (RAD 24L-40)  
Page 1

Committee's accounts rather than a media placement transfer. The Committee further stated that it amended the report as soon as the error was discovered.



**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Feenstra for Congress and Thomas Datwyler, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.